

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Larry D. Smith, Jr.
a/k/a Larry D. Smith
Debtor 1

First Investors Servicing Corp.
Movant(s)

v.

Larry D. Smith, Jr.
a/k/a Larry D. Smith

Respondent(s)
Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
Additional Respondent

Chapter 13

Case No. 1:20-BK-01221-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 22

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Larry D. Smith, Jr., through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
5. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Dated: September 19, 2020

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Camp Hill, PA 17011
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Saturday, September 19, 2020, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

William Craig, Esquire
Morton & Craig, LLC
110 Marter Avenue, Suite 301
Moroestown, NJ 08057
Counsel for Movant(s)

Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, Pa.C.P., Paralegal for
Paul D. Murphy-Ahles, Esquire